

**BXD**

Application granted.

SO ORDERED.



Hon. Ronnie Abrams

June 12, 2025

June 12, 2025

Via ECF

Honorable Ronnie Abrams  
United States Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Capunay Guzman v. Joyce, et al., No. 25-cv-4777-RA**

Dear Judge Abrams:

We represent Petitioner, Derwin Capunay Guzman (“Mr. Capunay”), in his Petition for a Writ of Habeas Corpus filed on June 5, 2025. On June 9, 2025, we filed a Motion to Compel Petitioner’s Return to the District. Your Honor ordered the Government to respond to Petitioner’s Motion by June 11 at 10:00 a.m. The Government requested and was granted an extension until 5:00 p.m. The Government timely filed their opposition just before 5:00 p.m. on June 11.

We are now in receipt of Your Honor’s Order for Petitioner to file a reply to the Government’s opposition by 12:00 p.m. tomorrow, June 13, 2025. We write to respectfully ask the Court for a short extension of that deadline, to 3:00 p.m. tomorrow. Counsel has personal obligations tomorrow morning in addition to other time-sensitive client work. This is the first request for an extension in this matter. I reached out to counsel for Respondents via email at 4:13 p.m. for their position on this request and let them know I would like to file by 5:00 p.m. I did not receive their response before filing.

Thank you for your consideration.

Respectfully submitted,

/s/ Jessica Swensen

Jessica Swensen

THE BRONX DEFENDERS



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cc: Anthony Sun, Assistant U.S. Attorney, via ECF